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CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTAUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 19-101 (SRN/ECW)

UNITED STATES OF AMERICA,)	REVISED INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2
)	21 U.S.C. § 802(32)(A)
v.)	21 U.S.C. § 813
)	21 U.S.C. § 841(a)(1)
AARON RHY BROUSSARD,)	21 U.S.C. § 841(b)(1)(B)
)	21 U.S.C. § 841(b)(1)(C)
Defendant.)	21 U.S.C. § 841(h)(1)(A)
)	21 U.S.C. § 841(h)(4)
)	21 U.S.C. § 843(b)
)	21 U.S.C. § 843(d)
)	21 U.S.C. § 846
)	21 U.S.C. § 853
)	21 U.S.C. § 952(a)
)	21 U.S.C. § 960(b)(2)(F)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy)

1. From in or about 2014, and continuing through on or about December 6, 2016,
in the State and District of Minnesota, and elsewhere, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally conspire with unindicted co-conspirator Grace
(True Name Unknown) and with others known and unknown to the grand jury: (a) to
distribute 40 grams or more of a mixture and substance containing a detectable amount of
N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), and mixtures
and substances containing detectable amounts of dibutylone hydrochloride and
4-ethylmethcathinone hydrochloride ("4-EMC"), all controlled substances, in violation of

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Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); (b) to distribute mixtures and substances containing detectable amounts of 2-(ethylamino)-1-phenylhexan-1-one hydrochloride and 4-fluoroamphetamine ("4-FA"), all controlled substance analogues which the defendant intended for human consumption, in violation of Title 21, United States Code, Sections 802(32)(A), 813, 841(a)(1) and 841(b)(1)(C); (c) to deliver, distribute and dispense said controlled substances and controlled substance analogues which the defendant intended for human consumption by means of the Internet, in violation of Title 21, United States Code, Sections 841(h)(1)(A) and 841(h)(4); and (d) to use the United States mail, a communication facility, to commit and to facilitate the commission of the distribution of said controlled substances and controlled substance analogues which the defendant intended for human consumption, in violation of Title 21, United States Code, Sections 843(b) and 843(d); which all resulted in the deaths of S.W.F., T.M.R., M.J.W., D.N.M., J.M.B., D.W.F., S.M.B., C.W.K., V.K.Y.P., P.J.R., and A.R.L., and serious bodily injury to T.O.T., D.L.S., C.D.S., and J.E.S.

Ways, Manners, and Means to Effect the Objects of the Conspiracy

2. During the period of the conspiracy, the defendant and his co-conspirators, used various ways, manners, and means to effect the objects of the conspiracy including, but not limited to, the following:

a. The defendant and his co-conspirators were members of a drug trafficking organization which distributed controlled substances and controlled substance analogues which they intended for human consumption (hereinafter all collectively referred to as "controlled substances").

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b. The defendant, **AARON RHY BROUSSARD**, would order controlled substances from unindicted co-conspirator Grace (True Name Unknown) and from other China-based drug suppliers using Internet websites.

c. Unindicted co-conspirator Grace (True Name Unknown) and other China-based drug suppliers would then import, or cause to be imported, controlled substances to the defendant, **AARON RHY BROUSSARD**, in the State and District of Minnesota and elsewhere.

d. Upon receipt of controlled substances sent by China-based drug suppliers, the defendant, **AARON RHY BROUSSARD**, would repack the controlled substances for sale to drug customers in the United States for human consumption, typically using small black or gold Mylar Ziploc bags.

e. The defendant, **AARON RHY BROUSSARD**, would market controlled substances to drug customers using various Internet websites including PlantFoodUSA.Net.

f. The defendant, **AARON RHY BROUSSARD**, would distribute controlled substances to drug customers using the United States mail and a United States Postal Service "Click-N-Ship" account registered under the name "Friendly Delivery."

g. The defendant, **AARON RHY BROUSSARD**, would receive compensation for controlled substances through a variety of online payment services and customer credit card payments.

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h. The defendant, **AARON RHY BROUSSARD**, would distribute controlled substances to drug customers even after learning that some had overdosed on the controlled substances he had supplied.

Overt Acts of the Conspiracy

3. During the period of the conspiracy, the defendant and his co-conspirators committed certain overt acts in the State and District of Minnesota including, but not limited to, the following:

a. On or about March 12, 2016, in Hopkins, Minnesota, the defendant, **AARON RHY BROUSSARD**, placed a drug order for 100 grams of 4-FA from unindicted co-conspirator Grace (True Name Unknown), which was shipped from China on or about March 16, 2016, and received by him on or about March 18, 2016, and which contained approximately 100 grams of fentanyl.

b. On or about April 1, 2016, in Hopkins, Minnesota, after receiving a drug order from S.W.F. in Atlanta, Georgia, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, S.W.F. ingested the fentanyl, which caused his death on or about April 6, 2016.

c. On or about April 4, 2016, in Hopkins, Minnesota, after receiving a drug order from T.O.T. in Belding, Michigan, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, T.O.T. ingested the fentanyl, which caused him serious bodily injury on or about April 7, 2016.

d. On or about April 8, 2016, in Hopkins, Minnesota, after receiving a drug order from T.M.R. in Paint Lick, Kentucky, the defendant, **AARON RHY BROUSSARD**,

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mailed a package to him which contained fentanyl. After he received the package, T.M.R. ingested the fentanyl, which caused his death on or about April 15, 2016.

e. On or about April 11, 2016, in Hopkins, Minnesota, after receiving a drug order from M.J.W. in Peoria Heights, Illinois, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, M.J.W. ingested the fentanyl, which caused his death on or about April 13, 2016.

f. On or about April 12, 2016, in Hopkins, Minnesota, after receiving a drug order from D.L.S. in Aliso Viejo, California, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, D.L.S. and D.N.M. ingested the fentanyl, which caused serious bodily injury to D.L.S. and the death of D.N.M. on or about April 16, 2016.

g. On or about April 12, 2016, in Hopkins, Minnesota, after receiving a drug order from J.M.B. in Stacy, Minnesota, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, J.M.B. ingested the fentanyl, which caused his death on or about April 14, 2016.

h. On or about April 12, 2016, in Hopkins, Minnesota, after receiving a drug order from D.W.F. in Deltona, Florida, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, D.W.F. ingested the fentanyl, which caused his death on or about April 16, 2016.

i. On or about April 14, 2016, in Hopkins, Minnesota, after receiving a drug order from S.M.B. in Millcreek, Pennsylvania, the defendant, **AARON RHY**

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BROUSSARD, mailed a package to him which contained fentanyl. After he received the package, S.M.B. ingested the fentanyl, which caused his death on or about April 17, 2016.

j. On or about April 14, 2016, in Hopkins, Minnesota, after receiving a drug order from C.W.K. in Dallas, Texas, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, C.W.K. ingested the fentanyl, which caused his death on or about April 18, 2016.

k. On or about April 15, 2016, in Hopkins, Minnesota, after receiving a drug order from V.K.Y.P. in Binghamton, New York, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, V.K.Y.P. ingested the fentanyl, which caused his death on or about May 2, 2016.

l. On or about April 18, 2016, in Hopkins, Minnesota, after receiving a drug order from J.E.S. in Waukee, Iowa, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, J.E.S. ingested the fentanyl, which caused him serious bodily injury on or about April 20, 2016.

m. On or about April 18, 2016, in Hopkins, Minnesota, after receiving a drug order from P.J.R. in Hazel Green, Wisconsin, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the package, P.J.R. ingested the fentanyl, which caused his death on or about June 2, 2016.

n. On or about April 27, 2016, in Hopkins, Minnesota, after receiving a drug order from C.D.S in Scranton, Pennsylvania, the defendant, **AARON RHY BROUSSARD**, mailed a package to him which contained fentanyl. After he received the

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package, C.D.S. and A.R.L. ingested the fentanyl, which caused serious bodily injury to C.D.S. and the death of A.R.L. on or about May 8, 2016.

o. On or about September 26, 2016, in Hopkins, Minnesota, the defendant, **AARON RHY BROUSSARD**, mailed a package to a drug customer containing 2-(ethylamino)-1-phenylhexan-1-one hydrochloride.

p. On or about December 6, 2016, in Hopkins, Minnesota, the defendant, **AARON RHY BROUSSARD**, possessed numerous controlled substances and controlled substance analogues including dibutylone hydrochloride, 2-(ethylamino)-1-phenylhexan-1-one hydrochloride, and 4-ethylmethcathinone hydrochloride ("4-EMC").

All in violation of Title 21, United States Code, Sections 802(32)(A), 813, 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), 841(h)(1)(A), 841(h)(4), 843(b), 843(d) and 846.

COUNT 2
(Importation of Fentanyl)

On or about March 16, 2016, in the State and District of Minnesota, and elsewhere, the defendant,

AARON RHY BROUSSARD,

aided and abetted by unindicted co-conspirator Grace (True Name Unknown) and others, did unlawfully, knowingly and intentionally import into the United States from a place outside thereof a mixture and substance containing 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a controlled substance, all in violation of Title 21,

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United States Code, Sections 952(a)(1) and 960(b)(2)(F), and Title 18, United States Code, Section 2.

COUNT 3

(Possession With the Intent to Distribute Fentanyl)

On or about March 18, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 4

(Distribution of Fentanyl Resulting in Death)

On or about April 1, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a controlled substance, which resulted in the death of S.W.F., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 5

(Distribution of Fentanyl Resulting in Serious Bodily Injury)

On or about April 4, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a controlled substance, which resulted in serious bodily injury to T.O.T, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

(Distribution of Fentanyl Resulting in Death)

On or about April 8, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a controlled substance, which resulted in the death of T.M.R., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

(Distribution of Fentanyl Resulting in Death)

On or about April 11, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide

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("fentanyl"), a controlled substance, which resulted in the death of M.J.W., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Distribution of Fentanyl Resulting in Serious Bodily Injury and Death)

On or about April 12, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide ("fentanyl"), a controlled substance, which resulted in serious bodily injury to D.L.S. and the death of D.N.M., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

(Distribution of Fentanyl Resulting in Death)

On or about April 12, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide ("fentanyl"), a controlled substance, which resulted in the death of J.M.B., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 10

(Distribution of Fentanyl Resulting in Death)

On or about April 12, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a controlled substance, which resulted in the death of D.W.F., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11

(Distribution of Fentanyl Resulting in Death)

On or about April 14, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a controlled substance, which resulted in the death of S.M.B., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12

(Distribution of Fentanyl Resulting in Death)

On or about April 14, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide

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("fentanyl"), a controlled substance, which resulted in the death of C.W.K., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 13

(Distribution of Fentanyl Resulting in Death)

On or about April 15, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a controlled substance, which resulted in the death of V.KY.P., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 14

(Distribution of Fentanyl Resulting in Serious Bodily Injury)

On or about April 18, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a controlled substance, which resulted in serious bodily injury to J.E.S., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 15

(Distribution of Fentanyl Resulting in Death)

On or about April 18, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a controlled substance, which resulted in the death of P.J.R., all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 16

(Possession With the Intent to Distribute
2-(Ethylamino)-1-Phenylhexan-1-One Hydrochloride)

On or about September 26, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of 2-(ethylamino)-1-phenylhexan-1-one hydrochloride, a controlled substance analogue which the defendant intended for human consumption, all in violation of Title 21, United States Code, Sections 802(32)(A), 813, 841(a)(1) and 841(b)(1)(C).

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COUNT 17

(Possession With the Intent to Distribute
2-(Ethylamino)-1-Phenylhexan-1-One Hydrochloride)

On or about December 6, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of 2-(ethylamino)-1-phenylhexan-1-one hydrochloride, a controlled substance analogue which the defendant intended for human consumption, all in violation of Title 21, United States Code, Sections 802(32)(A), 813, 841(a)(1) and 841(b)(1)(C).

COUNT 18

(Possession With the Intent to Distribute 4-EMC)

On or about December 6, 2016, in the State and District of Minnesota, the defendant,

AARON RHY BROUSSARD,

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of 4-ethylmethcathinone hydrochloride ("4-EMC"), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

If convicted of any of the counts of this indictment, the defendant,

AARON RHY BROUSSARD,

shall forfeit to the United States any property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of each such violation; any property used,

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or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation; and any substitute for such property under Title 21, United States Code, Section 853(p); including, all pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON